



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

March 22, 2005

CERTIFIED MAIL

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Mr. Raleigh Salazar
King County Airport/Boeing Field
P.O. Box 80245
Seattle, WA 98108

RECEIVED
KING COUNTY
JUL 14 2005
INTERNATIONAL
AIRPORT

Mr. Salazar:

RE: Dangerous Waste Compliance Inspection at King County Airport/Boeing Field
RCRA ID# WAD980986848 on February 16, 2005

Thank you for your time during the recent compliance inspection. The purpose of this inspection was to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). These regulations establish a system for safe and responsible management of dangerous waste. Based on my visit to your facility, it appears that most dangerous waste compliance issues have been well addressed.

As we discussed after the inspection, there were a few areas of non-compliance with the Dangerous Waste Regulations at King County Airport/Boeing Field. The conditions not in compliance are listed in the enclosed Compliance Report. Please complete the actions needed to achieve compliance as listed in the Compliance Report within the specified timeframes. Please be aware that any uncorrected violations are subject to enforcement action by the Department of Ecology, including the issuance of an administrative order and/or penalty under the Hazardous Waste Management Act (RCW 70.105.080 and .095).

Please complete and submit the reply portion of the Compliance Report, *along with a brief explanation of the actions taken for each item on a separate piece of paper*, and any requested documentation, to Barbara Smith at 3190 - 160th Ave SE, Bellevue, WA 98008 by April 29, 2005, so that our records properly reflect your compliance status. Please do not hesitate to contact me at BSmi461@ecy.wa.gov or (425) 649-7026 should you have questions or require clarification of any items in the Compliance Report.

Sincerely,

Barbara Smith, Hazardous Waste Compliance Inspector
Hazardous Waste and Toxics Reduction Program

KCSlip4 61682
SEA430046

**Washington Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Report**

Site: King County Airport/Boeing Field

RCRA ID#: WAD980986848

Inspection Date: February 16, 2005

Site Contacts: Raleigh Salazar

Phone: (206) 296-7408

E-mail: raleigh.salazar@metrokc.gov

Site Location: 6518 Ellis Ave S

Seattle, WA

At This Site Since: 1928

Generator/Site Status: MQG

FAX: (206) 296-7385

Website: www.metrokc.gov/airport/

NAICS#: 92119

Other General Government Support

Ecology

Lead Contact: Barbara Smith

E-mail: BSmi461@ecy.wa.gov

Report Date: February 25, 2005

Report By: Barbara Smith

Phone: (425) 649-7026

FAX: (425) 649-7098

Other Representatives: Warren Walton, Ecology, Bellevue



(Signed)

3-22-05

(Date)

Facility Background:

The King County Airport (Boeing Field) opened in 1928. The King County Maintenance facility at Boeing Field is operated under the King County Department of Transportation. The facility has various shops, storage areas, and offices located on the west side of the airport property. King County Airport Maintenance has generated hazardous waste in varying quantities over the past 15 years. Depending on the year, their regulatory status has been reported as large quantity generator (LQG), medium quantity generator (MQG), small quantity generator (SQG) and non-generator (XQG).

Inspection Summary:

Warren Walton and I arrived at the facility at 10:30 a.m. and met with Mr. Salazar, Facilities Maintenance Supervisor, in his office. We reviewed the compliance issues and photos from a visit to the facility on December 16, 2004, that Mr. Salazar had not been present for.

The compliance issues from the December visit were as follows:

1. Parts Washer: Designation and disposal of the listed hazardous waste solvent used in the parts washer

Mr. Salazar said that the facility has switched to a parts washer solvent that does not designate as dangerous waste through a vendor (Inland Technologies IT 30).

2. West End of Yard: Designation and disposal of paint solids in open drums and hazardous waste paint in 55-gallon drums

Mr. Salazar said all of the drums in the west yard area have been sent off-site for disposal. He said the paint solids were sent off site as solid waste and the hazard waste drums were sent off site on a dangerous waste manifest.

3. Bull Pen: Designation and disposal of containers of paint related material on pallets stored outside in the "bull pen"

Mr. Salazar said that some of the paint materials on pallets in the one of the open bays outside had been shipped off site for disposal. He said the others are still usable products and they are working on finding someone who could use them.

4. Spent Fluorescent Light Tubes: Recycling or disposal of spent fluorescent light

Mr. Salazar confirmed that their spent tubes are recycled through Ecolights.

In summary, Mr. Salazar said that the waste streams from the facility were the following:

- waste paint (less than 55 gallons per year)
- paint thinner (reused)
- parts washer solvent (recently switched to a non-hazardous type)
- used oil (recycled off site through Emerald Services)
- batteries (recycled)
- absorbent pads used to clean up occasional jet fuel spills
- antifreeze (non-hazardous waste)
- fluorescent lamps (recycled)

During our last visit, we had heard that there were serious concerns that the glass beads in the reflective paint on the runway were being picked up by jet engines and causing engine damage. We asked Mr. Salazar about the removal of glass bead paint striping at the airport. He said that the paint with glass beads had been removed and replaced with new product. We asked if the paint that was removed had been tested for lead and chromium prior to disposal. He said the removal was being handled by a contractor, Spiedel Sightline Company. He said he had not seen any dangerous waste test results to date. He said paint chip samples were taken. We asked to see the MSDS for the paint material that had been removed from the runway. The paint was manufactured by TMT Pathway Products LLC of Salem, Oregon. We reviewed the MSDS for Norline "Traffic Paint White" and "Washington Yellow Traffic Paint". The Washington Yellow Traffic Paint contained hexavalent chromium at .67% by weight and lead at 3% by weight.

Mr. Salazar said the paint had been removed from the runway by shot peening and jet blast. King County street sweeper equipment then collected the waste and deposited it in the airport wash rack system. Mr. Salazar showed us a sample of the waste stream. It contained quite a bit of asphalt and small rocks along with some visible paint chips. We said the waste would need to be tested for TCLP metals (lead and chromium) prior to disposal.

Records Review:

We reviewed the manifest for the recent shipment of hazardous waste (manifest #30130). The waste was shipped on December 21, 2004, but the Return to Generator (RTG) copy signed by the receiving facility had not yet been received by King County. We explained the requirement in the Dangerous Waste Regulations for receipt of the RTG copy within 35 days and the requirement for an exception report to Ecology if it is not received within 45 days. Fifty seven days had passed since the waste shipment left King County Maintenance. Mr. Salazar said he would track down the paperwork. He said it was possible that the RTG copy may have come back but had not yet been forwarded to his office and

placed in the file. He said no other manifests were currently kept at the facility. We explained that the facility must keep manifest records or a copy of manifest records on site.

Facility Inspection:

Mr. Salazar then escorted us on an inspection of the facility including the shop area, the “west yard”, the bull pen, and the wash rack area. We noted that the parts washer in the shop area had been re-labeled since the December visit as IT 30 solvent from Inland Technologies. In the west yard the open drums of dried paint waste and water were gone as were the two drums of dangerous waste “wet paint”.

In the open bay “Bull Pen” area (Bay # 5 of 10), some of the accumulation of old paint had been removed and sent off site for disposal. Mr. Salazar said that they had tried on three occasions to transfer the remaining paint that King County could not use to someone who could use it. He said each time, the transaction did not go through. He said it is useable material and they would determine if they can find someone who can use it or if it can't be used, to dispose of it as waste.

Also in the bull pen area, a 55-gallon drum was being used to collect used oil. The drum sat on a secondary containment pallet. The drum was labeled “Waste Oil” but the label was turned toward the back wall (see photo below – used oil drum is the black drum at the rear with the funnel in the top). Mr. Salazar said he would find out if it was necessary to have this collection drum at all. We asked Mr. Salazar to label the drum as “Used Oil” if its use was continued. We also noted that some secondary containment had been added around the paint thinner drum by surrounding it with 4” x 4” timbers and lining the area with plastic. We mentioned that the fire department would probably like to see a risk label on the drum and that the thinner was considered a product and not a waste as long as it is in use.



We walked out to the wash rack area. The vault that contained the sweepings collected from the removal of the runway striping paint was below grade and none of the sweepings were visible.

Inspection De-Brief:

We returned to Mr. Salazar's office and reviewed our findings with him. We told him that we thought the facility could operate as a Medium Quantity Generator (MQG) if shipments of waste were more regular than they have been in the past. We provided Mr. Salazar with two guidance documents showing the reduced requirements for MQGs over LQGs. We also reviewed the annual reporting requirements and asked that he insure that an annual report is filed for the facility for 2004.

The compliance issues that we reviewed with Mr. Salazar were:

- Designation testing for the waste from the runway paint removal project
- Locating the manifest copy with the receiving facility's signature or filing an exception report with Ecology
- Keeping a copy of manifest records on site
- Labeling of the used oil collection drum

We then concluded the inspection and left the site at 11:35 a.m.

Compliance Problems

The following conditions identified during the inspection on February 16, 2005, were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the citation from the regulations, (2) the specific observations from the inspection that highlight the problem, and (3) the corrective measures needed to fix the problem and achieve compliance. On the last page(s) of this report is a 'Compliance Certificate' which again lists these compliance citations and directives in a table. That certificate also lists the deadlines for the corrective measures to be completed. The certificate explains how to complete the form and return it to the Department of Ecology.

Designate Wastes

(1) WAC 173-303-070(3), as referenced by 170(1): A solid waste must be properly designated. Procedures must be followed for determining if a solid waste is also a dangerous waste or an extremely hazardous waste.

Solid waste collected in the wash rack from the runway paint removal project had not been designated or King County Airport Maintenance did not have the results of the designation testing available at the time of the inspection.

Within 30 days of receipt of this report, provide documentation to Ecology that designation of the solid waste generated in the runway paint removal project has occurred. This documentation shall include, but not be limited to, copies of the analytical results of designation testing for lead (TCLP) and chromium (TCLP) and any contracts with testing laboratories.

Submit exception report within 45 days

(2) WAC 173-303-220(2) as referenced by 170(2): An exception report was not submitted to Ecology within 45 days of waste shipment. Exception reports must be filed when confirmation of waste receipt (i.e., a signed manifest) is not received from the TSD.

Manifest # 30130 was shipped on Dec. 21, 2004, and the signed copy of the manifest had not been returned to the generator or it was not available during the inspection.

Within 10 calendar days of the receipt of this report, submit to Ecology a copy of the missing manifest or an exception report for manifest # 30130 per WAC 173-303-220(2)(b), including the information specified in WAC 173-303-220(2)(c).

Manifest copies retained

(3) WAC 173-303-210(1) as referenced by 170(2) and 180(3): The appropriate signed manifests were not kept by the generator.

At the time of the inspection, copies of manifests for past years were not available at the facility.

Within 10 calendar days of the receipt date of this letter, obtain copies of manifests for shipments of wastes from your facility that occurred during the years 2000, 2001, 2002, 2003 and 2004. Implement procedures to ensure that copies of the manifests with the receiving facility's signature are kept on-site

for the required five years. Send copies of the manifests for 2000 through 2003 to Ecology with your Compliance Certificate (see below) on or before April 29, 2005.

Used Oil Labeling

(4) 40 CFR Part 279.22 (c) as referenced in WAC 173-303-515 (6): Containers of used oil must be labeled or marked clearly with the words "Used Oil".

The used oil container in the bull pen was labeled as Waste Oil and the label or marking was turned toward the wall so that it was not visible.

Within 10 calendar days of the receipt of this report, label or clearly mark the used oil container with the words "Used Oil". Send a photograph showing this change to Ecology with your Compliance Certificate (see below) on or before April 29, 2005.